OCT 2 3 2019

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA

Case No.

3:19 CROCK

In Violation of: 18 U.S.C. § 1028(a)(7)

LARRY VERNON SNOW

18 U.S.C. § 1028(f)

BRYANT AUSTIN SNOW

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Commit Identity Theft)

- 1. From on or about April 21, 2018, to on or about May 2, 2018, in the Western District of Virginia, and elsewhere, the defendants, LARRY VERNON SNOW and BRYANT AUSTIN SNOW, conspired to knowingly transfer, possess, and use, without lawful authority, the means of identification of other persons, to wit, the Names, Addresses, Vehicle Identification Numbers, and Vehicle License Plate Numbers of J.S. and R.R., knowing that the means of identification belonged to another actual person, with the intent to commit, and to aid or abet, and in connection with, any unlawful activity that constitutes a violation of Federal law and a felony under any applicable State or local law, to wit:
 - Computer Invasion of Privacy with Distribution in violation of Section 18.2-152.5 of the Code of Virginia;
 - Distribution of a Controlled Substance in violation of Section 18.2-248 of the Code of Virginia;
 - Conspiracy to Commit Distribution of a Controlled Substance in violation of Section 18.2-256 of the Code of Virginia;
 - Possession of a Controlled Substance in violation of 21 U.S.C. § 844;

- Possession with Intent to Distribute a Controlled Substance in violation of 21 U.S.C. § 841;
- Conspiracy to Commit Possession with Intent to Distribute a Controlled Substance in violation of 21 U.S.C. § 846; and
- Unlawful Use of State Motor Vehicle Records in violation of 18 U.S.C. § 2722(a), the said means of identification was transported in the mail in the course of such transfer or use, and the offense was committed to facilitate a drug trafficking crime, in violation of 18 U.S.C. § 1028(a)(7).
 - 2. All in violation of Title 18, United States Code, Section 1028(f) and (b)(3).

COUNTS TWO AND THREE (Identity Theft)

- 3. From on or about April 27, 2018, to on or about May 2, 2018, in the Western District of Virginia, the defendants, LARRY VERNON SNOW and BRYANT AUSTIN SNOW, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, described below, knowing that the means of identification belonged to another actual person, with the intent to commit, and to aid or abet, and in connection with, any unlawful activity that constitutes a violation of Federal law and a felony under any applicable State or local law, to wit:
 - Computer Invasion of Privacy with Distribution in violation of Section 18.2-152.5 of the Code of Virginia;
 - Distribution of a Controlled Substance in violation of Section 18.2-248 of the Code of Virginia;
 - Conspiracy to Commit Distribution of a Controlled Substance in violation of Section 18.2-256 of the Code of Virginia;
 - Possession of a Controlled Substance in violation of 21 U.S.C. § 844;
 - Possession with Intent to Distribute a Controlled Substance in violation of 21 U.S.C. § 841(a)(1);
 - Conspiracy to Commit Possession with Intent to Distribute a Controlled Substance in violation of 21 U.S.C. § 846; and
- Unlawful Use of State Motor Vehicle Records in violation of 18 U.S.C. § 2722(a), the said means of identification was transported in the mail in the course of such transfer or use, and the offense was committed to facilitate a drug trafficking crime.

Counts	Victim	Means of Identification
Two	J.S.	Name, Address, Vehicle Identification Number, and Vehicle License Plate Number
Three	R.R.	Name, Address, Vehicle Identification Number, and Vehicle License Plate Number

4. All in violation of Title 18, United States Code, Section 1028(a)(7) and (b)(3).

A TRUE BILL, this 23rd day of October 2019

/s/ Foreperson

GRAND JURY FOREPERSON

THOMAS T. CULLEN UNITED STATES ATTORNEY